

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

PLAINTIFF'S ASSENTED-TO MOTION TO FILE UNDER SEAL
PLAINTIFF'S MOTION TO QUASH SUBPOENAS AND
DEPOSITION NOTICES OR FOR A PROTECTIVE ORDER

Pursuant to Local Rule 7.2 and this matter's Stipulated Protective Order (Dkt. No. 55), Plaintiff, Students for Fair Admissions, Inc. ("SFFA"), hereby brings this assented-to motion seeking an order to file under seal a motion to quash two subpoenas and deposition notices or for a protective order. SFFA's motion will seek to quash the depositions of two of its standing members. This motion will contain information that has been designated as Confidential and/or Highly Confidential – Attorneys' Eyes Only pursuant to the Stipulated Protective Order. SFFA requests an order that allows the motion and all accompanying exhibits to be filed under seal in their entirety. Pursuant to Local Rule 7.1(a)(2), Defendant was aware of this motion and assents to it.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow SFFA's motion to quash or for a protective order and all accompanying exhibits to be filed under seal until further order of the Court and to be viewed only by the Judge, her clerk(s), and Court personnel.

Respectfully submitted,

By: /s/ Benjamin C. Caldwell

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Dated: March 13, 2017

Counsel for Plaintiff SFFA

CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(a), I hereby certify that Defendant's counsel was made aware of this motion before it was filed and assents to the relief requested therein.

/s/ Benjamin C. Caldwell

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

/s/ Benjamin C. Caldwell